

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TARA RANIERE, NICHOL BODDEN, and
MARK A. VOSBURGH, on behalf of
themselves individually, and on behalf of all
similarly-situated persons,

Plaintiffs,

v.

CITIGROUP INC., CITIBANK, N.A., and
CITIMORTGAGE, INC.,

Defendants.

Civil Action No. 11 CV 2448 (RWS)

NOTICE OF MOTION

TO: Thompson Wigdor & Gilly LLP
Scott B. Gully, Esq.
Douglas H. Wigdor, Esq.
85 Fifth Avenue, Fifth Floor
New York, New York 10003
(212) 257-6800

PLEASE TAKE NOTICE that on Wednesday June 1, 2011, Defendants Citigroup Inc., Citibank, N.A., and CitiMortgage, Inc., by and through their attorneys, Morgan, Lewis & Bockius LLP, will move before The Honorable Robert W. Sweet, United States District Court for the Southern District of New, for an order granting Defendants' Motion to Dismiss or, in the Alternative, to Transfer or Stay.

Dated: May 3, 2011
New York, New York

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Sam S. Shaulson
Sam S. Shaulson
Ellyn Pearlstein
101 Park Avenue
New York, New York 10178
Tel: (212) 309-6718
Fax: (212) 309-6001
sshaulson@morganlewis.com
epearlstein@morganlewis.com

Attorneys for Defendants
Citigroup Inc., Citibank, N.A., and
CitiMortgage, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served by ECF and regular mail true and correct copies of Defendants' Notice of Motion for Defendants' Motion to Dismiss or, in the Alternative, to Transfer or Stay, Defendants' Memorandum of Law in Support of Defendants' Motion to Dismiss or, in the Alternative, to Transfer or Stay and Declaration of Sam S. Shaulson, this 3rd day of May, 2011, on:

Thompson Wigdor & Gilly LLP
Scott B. Gully, Esq.
Douglas H. Wigdor, Esq.
85 Fifth Avenue, Fifth Floor
New York, New York 10003
(212) 257-6800

_____/s/ Ellyn Pearlstein
Ellyn Pearlstein